

November 8, 2021

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
45 L Street NE
Washington, DC 20554



RE: The Emergency Broadband Benefit Program, WC Docket No. 20-445

Dear Ms. Dortch:

Next Century Cities is a nonprofit 501(c)(3) coalition of over 200 member municipalities across the United States that works to bring fast, affordable, and reliable broadband to residents. We work on behalf of local elected officials, their appointees, and community leaders, advocating for technology and telecommunications policies that support high-speed connectivity in every community.

NCC requested a meeting with FCC officials for local leaders from Indiana, New Mexico, Texas, and Washington to share learnings associated with community outreach and supporting enrollment for the Emergency Broadband Benefit “EBB” program. On November 4, 2021, city officials and NCC staff met with Commissioner Geoffrey Starks, Chief of Staff and Senior Legal Advisor for Wireless and International, William Davenport, Legal Advisor for Wireline and Public Safety, Austin Bonner, and Special Advisor, Alisa Valentin. The attendees included:

- Alice Lawson, Broadband and Cable Program Manager and Wireless Affairs Advisor, and David Keyes, Digital Equity Program Manager, City of Seattle, Washington
- Luce Rubio, Communications Coordinator, Doña Ana County, New Mexico
- Rick Dietz, Information and Technology Services Director, City of Bloomington, Indiana
- Rondella Hawkins, Telecommunications and Regulatory Affairs Officer, City of Austin, Texas
- Francella Ochillo, Executive Director, Next Century Cities



- Corian Zacher, Policy Counsel, State and Local Initiatives, Next Century Cities
- Lukas Pietrzak, Program Manager, Partnerships & Campaigns, Next Century Cities
- Brittany-Rae Gregory, Communications Director, Next Century Cities

The Emergency Broadband Benefit Program (“EBB”), launched on May 12, 2021, marked a fundamental shift in the way federal policymakers view broadband affordability. For the first time since broadband services were incorporated into Lifeline, the FCC implemented a program devoted exclusively to bringing broadband within reach to millions of households whose greatest connectivity barrier was affordability. The EBB has positively impacted many communities, nonetheless numerous challenges to accessing the benefit persist.

Successes and Lessons Learned from EBB Rollout and Implementation

City officials started by spotlighting the success of the EBB rollout in their communities. Ms. Rubio highlighted that in New Mexico, collaborative groups have partnered with state and municipal government agencies to help build public awareness. City officials also shared that the EBB has activated many community groups, especially those focused on education, to begin working with families struggling with affordability and other barriers to adoption. Ms. Lawson shared that in Seattle, over 12,000 households enrolled in the EBB, proof that the City’s community outreach strategies are working. Ms. Hawkins also shared [a testimonial](#), documenting the United Way of Greater Austin’s success in facilitating EBB enrollment. However, the local leaders cautioned that while community groups in urban areas can assist families, outreach is much more difficult in rural areas and hard to reach communities.



Local leaders also touched on the lessons learned, specifically, regarding the level of information available to consumers as they move through the enrollment process. Ms. Lawson emphasized that neither the FCC’s website nor GetBroadband.org clearly list which providers are participating in the program. This lack of information means that applicants either need to know which ISP they can contact or dig through an unfamiliar website. Ms. Rubio shared that the only provider participating in the EBB has lagged in processing applications in several communities in New Mexico, delaying K-12 and college students' much-needed connectivity.

Mr. Keyes also noted that direct marketing from providers in Seattle, Washington, explains why a large percentage of EBB subscribers already had information about Lifeline. He suggested that this is likely due to providers offering increased phone benefits with an EBB sign-up and an easier application process.

In Austin, Texas, the City, and the Public Housing Authority have joined forces to create a one-of-a-kind “Resident Digital Ambassador” program. The program employs residents of Austin Public Housing, via a stipend, to assist neighbors in adopting digital tools. The program has proven successful for the community, including three Resident Digital Ambassadors who helped 30 neighbors to successfully enroll in the EBB program. According to these Resident Digital Ambassadors, many residents that now have EBB report they would not have Internet access at all without it. Notably, about half of the residents that registered for EBB had never in their lives had an Internet connection. About a quarter of residents registered had never had Internet for more than a few months each year.

Thirty percent of Housing Authority of the City of Austin residents have a disability, and twenty-five percent are seniors. North Loop is a property designated for seniors and people with disabilities. Internet users at North Loop may have low literacy, learning disabilities, or other



factors. Residents also reported that they have found it easiest to register for the EBB by going to a brick-and-mortar ISP location even though many residents do not have transportation to these locations.

According to Resident Digital Ambassadors, consumers would benefit from notifications or reminders to record their usernames and passwords. Many consumers assumed that they would be able to create multiple EBB applications and therefore do not store this information in case one application is rejected. Consumers also expressed a desire to be able to reset their passwords. Relatedly, consumers need to know if their EBB application has been rejected before they receive an application from an ISP. Finally, another administrative note, residents urge the Commission to give more time to work on an application before the website session times out. Being able to pause and continue an application later would make the application process more manageable.

Ms. Hawkins also shared the feedback from Community Tech Network, a non-profit that works with senior citizens. They raised concerns that many older Americans applying for the EBB may not have the digital skills and experience necessary to complete the application online. The online application requires an email address for submission, which some eligible applicants do not have. Similarly, emails from USAC about its need for more information or supporting materials may go unnoticed by consumers who are not familiar with electronic correspondence or may not know how to fulfill administrative requests.

Making it mandatory to select a preferred method for communication, either email or phone, may help ease the communication challenges for older, adult applicants. Further, implementing automation and audit trail for phone communications may be difficult, but it would also make the end-to-end EBB application process more accessible for largely disconnected communities.



There was consensus that the complexity of the EBB enrollment process requires substantial time and resources, through municipal staff and volunteers, to help families successfully complete their applications. Ms. Lawson stated that several factors make community partners hesitant about doing community outreach. For instance, they are not always equipped to make assurances about the two-step application process, variability in options from different participating providers, how long the program will last, or confusing service charges. Additionally, Ms. Lawson emphasized that those challenges are magnified when conducting outreach among non-English speaking communities. Finally, she noted that the EBB application is only available in English and Spanish, creating barriers for other non-English speaking communities who would like to apply to the program.

Mr. Dietz underscored the needs of smaller municipalities across the country, particularly for residents in Bloomington, Indiana. He reiterated that countless communities lack the resources to support a full-time digital inclusion staff, but the need for connectivity is extensive. In Bloomington's case, the task of informing and assisting residents instead falls into the larger IT portfolio, limiting capacity for public awareness campaigns. As background, Bloomington conducted a statistically valid Digital Equity Survey in April 2020 and found that essentially 0% of the low-income residents sampled were aware of federal subsidies or low-income provider plans. Accordingly, Dietz asked the Commissioner and his staff to provide an opportunity for communities to aggregate sign up processes, allowing residents to sign-up for broadband subsidy when applying for other federal subsidies such as those related to housing or food. Doing so would allow community organizations to assist more residents. In smaller cities, towns, and counties – where governments are unlikely to have resources to do community outreach – it would also incentivize ISPs to work alongside low-income populations. Finally, Mr. Dietz noted that the



Commission should consider the impact of competition in Multiple Tenant Environments as it develops broadband policy around affordability.

Local Officials Suggest Critical Changes to Streamline the EBB Program

Municipal officials made suggestions to that would make it easier for community members to access the EBB, improving overall effectiveness. Ms. Lawson noted that allowing for aggregation of service accounts in affordable housing Multiple Tenant Environments, where EBB eligible households are often concentrated, would support maximum program participation. Aggregation of accounts and reimbursements through the housing providers would remove individual application barriers while promoting enrollment. She also shared that clearly posting which providers participate in specific areas will give applicants the confidence to apply for the program, reducing hurdles associated with selecting a provider.

There was unanimous agreement that more funding is needed to facilitate community outreach and successful enrollment. As new organizations are finding new ways to do important digital equity work, the need for federal support for community organizations is vital. Ms. Rubio noted that in Sunland Park, New Mexico, Internet access is so low that the city is fundraising to stand up digital electronic boards that can inform residents about the EBB in places where they naturally gather or visit – bus hubs, the post office, or parks. To install the boards, the municipality's office needs better broadband service. With Congressional support, the FCC can ensure that new funding programs bolster organizations that are capitalizing on their community-based knowledge and expertise to expand connectivity.

Additionally, the local leaders agreed that the FCC should find ways to support municipalities that are activating community organizations to support their efforts. Aggregating



sign-up processes with other programs and promoting effective ways to help facilitate enrollment would ultimately increase program awareness and enrollment. The communities present on the call already foster relationships with diverse local partners, a limited resource for federal agencies. They possess the capabilities and plans to grow those partnerships further.

Finally, city officials requested that the FCC to improve access to EBB program data at the local level to support analysis and reporting. Ms. Lawson urged the FCC to consider releasing more details associated with the five-digit zip code data (e.g., mobile or fixed service, service provider) which helps local officials better understand broadband needs in low-income areas. Additionally, Mr. Keyes noted that it would be helpful if the FCC would research and report on the level of enrollment through different marketing and signup methods, illustrating which outreach methods are more effective than others. Keyes pointed out that the FCC still does not release which providers they have approved for alternate plans. Releasing this information would be valuable for local analysis.

Local Officials Invite Collaboration with the FCC

Just as local insights inform the Commission's EBB strategy, other federal programs could benefit from community-level perspectives. Local leaders have first-hand knowledge of the connectivity barriers that remain, insights that should inform federal broadband policy. FCC coordination with local governments is necessary to help ensure that broadband adoption reaches every household in the United States.

Next Century Cities invited the Commission to use our organization as a resource for connecting and collaborating with local leadership. As the Commission begins to explore future funding opportunities and programs, it must tap into community-based knowledge and



experiences. This will guarantee that new broadband opportunities will meet all residents' needs, regardless of zip code.

Respectfully submitted,

/s/

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APPENDIX A

Emergency Broadband Benefit Enrollment in Seattle, Washington

